

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN  
MADISON DIVISION

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ERICK D. RIGBY

Plaintiff,

Case No. 3:19-cv-00036

v.

CROSSCHECK SERVICES, LLC d/b/a  
OPTIO SOLUTIONS, LLC d/b/a QUALIA  
COLLECTION SERVICES

Defendant.

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**DEFENDANT CROSS CHECK SERVICES, LLC D/B/A OPTIO SOLUTIONS, LLC  
D/B/A QUALIA COLLECTION SERVICES' MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Defendant Cross Check Services, LLC d/b/a Optio Solutions, LLC d/b/a Qualia Collection Services<sup>1</sup> (“Optio”), by and through its undersigned counsel Lippes Mathias Wexler Friedman LLP, moves the Court, pursuant to Fed. R. Civ. P. 56, for an Order granting Optio’s motion for summary judgment and dismissing Plaintiff Erick Ribgy’s (“Plaintiff”) Complaint. As set forth in the Brief and other documents in support of the motion, Optio has established that its conduct at issue did not violate the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”) or the Wisconsin Consumer Act, Wis Stat. § 427 *et seq.* (the “WCA”) as a matter of law.

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<sup>1</sup> Optio Solutions, LLC is an active Delaware limited liability company and does do business as Qualia Collection Services. Optio Solutions, LLC is wholly owned by CrossCheck, Inc., but has no association with CrossCheck Services, LLC. Accordingly, this memorandum is being submitted on behalf of Optio Solutions, LLC d/b/a Qualia Collection Services.

For the reasons further articulated in the Brief and other documents relied upon in support of the motion, Optio requests an Order, pursuant to Fed. R. Civ. P. 56, granting it summary judgment, together with all other relief this Honorable Court deems just and proper.

Dated: December 13, 2019

**LIPPES MATHIAS WEXLER FRIEDMAN LLP**

s/ Brendan H. Little

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